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September 8, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

In re: **WT Docket No. 03-66, Amendment of Parts 1, 21, 73, 74 and 101 of  
the Commission's Rules to Facilitate the Provision of Fixed and  
Mobile Broadband Access, Educational and Other Advanced Services  
in the 2150-2162 and 2500-2690 MHz Bands**

Dear Ms. Dortch:

The Archdiocese of Los Angeles ("Archdiocese") wholeheartedly supports the proposals submitted jointly by the Wireless Communications Association International, the National ITFS Association and the Catholic Television Network (the "MDS/ITFS Coalition"). The Archdiocese believes strongly that the continuing success of both MDS and ITFS services depend on the adoption of rules and policies as proposed by the MDS/ITFS Coalition. The Archdiocese also supports the additional joint comments filed separately today by the Catholic Television Network and the National ITFS Association in the above-referenced proceeding.

The Archdiocese is the largest archdiocese in the United States with over five million members in three southern California counties covering approximately 8,000 square miles. The Archdiocese's school system consists of 278 Catholic schools, making it one of the three largest school systems in California. For over 35 years, the Archdiocese has used ITFS frequencies to deliver instructional video programming to its schools.

The Archdiocese initially had four analog channels for educational programming, which were used to full capacity. Then, in 1996, the Archdiocese integrated its broadcast system with Pacific Bell Video Services' digital MMDS network and added two more channels. Prior to this digital conversion, the Archdiocese was utilizing its entire analog spectrum for its own educational programming. The conversion to digital not only improved signal quality, it allowed the Archdiocese to lease some of its capacity (75%) to a commercial operator.

Over the years, the number of schools that have requested ITFS equipment and the number of courses made available to our schools has increased substantially. Indeed, the Archdiocese has invested over \$15 million in this system, a sizable portion of which has come from our commercial MMDS partners.

Today, teachers have access to a wide variety of courses such as science, language arts, math, social studies, religion/values, technology, languages, art, and physical education. Courses are divided into different levels, which allow teachers to utilize the appropriate courses for students of all ages. Through the Archdiocese's newly enhanced web site (<http://telecommunications.la-archdiocese.org>), students and teachers can customize and individualize schedules and coursework. This is particularly important given that many students in our schools are from multi-ethnic background, English-limited, language impaired, or economically deprived. For example, 48% of our students in elementary schools are Hispanic, 11% are Pacific Islander, and 7% are African-American. Our educators recognize that integrating technology into the classroom will help to meet students' individual learning styles and prepare them for an increasingly technological world. For this reason, the Archdiocese actively assists its schools to develop and implement technology plans that will assist them in providing a better education. ITFS plays a critical role in the development of these plans.

Our existing ITFS system limits us to the wireless delivery of downstream transmissions. A two-way cellular build out will not only allow our students to have high-speed Internet access in each classroom, but it will also enable the creation of a wide-area network employing ATM signals traveling via our ITFS channels. In preparation for this transition, the Archdiocese has taken two significant steps. First, the Archdiocese installed one of the largest mainframe computer servers, used exclusively for instruction, of any school system in the country. This server is used to digitize and store all of the Archdiocese's existing analog instructional materials. Once the Archdiocese has wireless high-speed Internet access in its schools, these and additional "digitized instructional assets" will be available "on-demand" to our students. Second, the Archdiocese has developed a Strategic Technology Integration Initiative, which includes the use of ITFS channels, in order to further integrate technology into the classroom. The goal of this initiative is for technology to: (a) maximize student learning; (b) address various student learning styles; (c) prepare students to function in today's high-tech society; (d) prepare staff; (e) simplify classroom management; (f) reduce administrative burdens; and (g) maximize the use of limited resources.

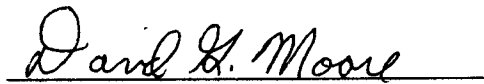
The Archdiocese does not have centralized funding to support the integration of technology into its schools. Indeed, over one hundred Catholic schools in the Archdiocese serve inner-city communities, many of which are struggling financially. Therefore, the revenues the Archdiocese now receives from leasing excess capacity have become the source of income for the operation, expansion and improvement of our ITFS program. Without such revenues and technical assistance from our commercial partner, the Archdiocese would not be able to implement its technology plans and would be forced to eliminate wireless instructional technology from its schools. This would be detrimental to the education of our students and the professional development of our teachers.

This is why the Archdiocese is particularly concerned with the Commission staff's proposal in this proceeding which would require all licensees in the 2500-2690 MHz band to reduce their power so that the entire band could be used for low power cellularized services. It would not be practical or economically feasible for the Archdiocese to convert its entire high site, high power video and data operations to a cellular network technology. ITFS licensees such as the Archdiocese, whose operations are firmly based in high power technologies that have worked successfully for decades, would likely be forced to cease service if the Commission were to adopt its alternative

low power proposal. Those most affected by such a shut-down would be the hundreds of thousand of students who depend on ITFS services as part of their core curriculum.

If the Commission adopts the new bandplan, rules, and policies as proposed by the MDS/ITFS Coalition, the Archdiocese will be able to and plans to use a wireless digital, two-way system that offers both high power high site video and data services along with a broadband Internet data services to schools and other locations within the Archdiocese. Such an enhanced ITFS system will enable the Archdiocese to reduce the unit cost of educating students, enhance available curriculum, and have a continuing source of funding to support these efforts. We appreciate this opportunity to comment in this important proceeding.

Very truly yours,

A handwritten signature in cursive script, reading "David G. Moore", is written over a horizontal line.

David G. Moore  
Director of Telecommunication Services  
Archdiocese of Los Angeles Education  
and Welfare Corporation